

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI**

**A.M., by and through his mother and next
friend, Aparna Deora, Ph.D.,**

Plaintiff,

v.

**BRIDGECREST ACCEPTANCE
CORPORATION d/b/a Bridgecrest,**

Defendant.

Case No. 20-553

NOTICE OF REMOVAL

COMES NOW Defendant Bridgecrest Acceptance Corporation d/b/a Bridgecrest (“**Bridgecrest**”), by and through its counsel of record and for the purpose of removing this cause of action to the United States District Court for the Eastern District of Missouri, shows the Court as follows:

1. This action is presently pending in the Circuit Court of St. Louis County, Missouri under case number 20SL-CC00926 (the “Action”). The Petition was filed by Plaintiff on February 24, 2020 against Bridgecrest. Plaintiff served the Petition on Bridgecrest on March 19, 2020.

2. Pursuant to 28 U.S.C. § 1446(b), Bridgecrest has thirty (30) days from the receipt of the Summons and Petition to seek removal of the action to this Court. Accordingly, this Notice of Removal is timely filed. No orders have been entered in the Action as of the filing of this Notice of Removal.

3. This action is subject to removal to this Court pursuant to 28 U.S.C. § 1332 and 28 U.S.C. § 1367. As alleged in the Petition, Plaintiff A.M. is a minor residing in St. Louis County, Missouri. Defendant Bridgecrest is an Arizona corporation with its principal place of business in

Arizona. Accordingly, there is complete diversity. Additionally, the amount in controversy exceeds \$75,000. Plaintiff seeks damages of more than \$650,000.

4. Pursuant to 28 U.S.C. § 1446(a) and Local Rule 2.03, attached hereto as **Exhibit A** and incorporated herein by reference are copies of the Summons and Petition and Return of Service, which constitute all process, pleadings, and orders in the Action.

5. Bridgecrest shall, promptly upon filing this Notice of Removal, give written notice thereof to Plaintiff and file a copy of this Notice of Removal with the Circuit Court of St. Louis County, Missouri, as required by 28 U.S.C. § 1446(d) and Local Rule 2.03. A copy of the Notice of Filing Notice of Removal (without attachments) is incorporated herein and attached hereto as **Exhibit B**.

6. Bridgecrest reserves the right to amend or supplemental this Notice of Removal.

7. Bridgecrest reserves all defenses.

WHEREFORE, Defendant Bridgecrest Acceptance Corporation d/b/a Bridgecrest prays that this action be removed from the Circuit Court of St. Louis County, Missouri to the United States District Court for the Eastern District of Missouri, and for such other and further relief as the Court deems just and equitable.

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Dated April 17, 2020:

Respectfully submitted,

By: /s/ Juliet A. Cox

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ATTORNEYS FOR DEFENDANT

BRIDGECREST ACCEPTANCE

CORPORATION

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 17th day of April, 2020, the above and foregoing was filed electronically with the Eastern District of Missouri, and a service copy was served upon the following via electronic mail:

A.M., by and through his mother and next friend:

Aparna Deora, Ph.D.

1550 Timberlake Manor Pkwy

Chesterfield, MO 63017

aparnadeora@hotmail.com

By: /s/ Juliet A. Cox

ATTORNEYS FOR DEFENDANT

BRIDGECREST ACCEPTANCE

CORPORATION